

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

GREENBERG TRAURIG LLP

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Counsel for Alexander's Rego Shopping Center, Inc.

In Re:

BED BATH & BEYOND INC., *et al.*,

Debtors.¹

Case No.: 23-13359 (VFP)

Chapter: 11

Judge: Vincent F. Papalia

APPLICATION FOR ADMISSION *PRO HAC VICE*

Alan J. Brody, ("Movant"), a member in good standing of the Bar of the State of New Jersey and an attorney admitted to practice before the United States District Court for the District of New Jersey, and a shareholder with Greenberg Traurig LLP, hereby files this Application (the "Application") with the Court for an order permitting Heath B. Kushnick to practice *pro hac vice*

¹ The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.'s principal place of business and the Debtors' service address in these chapter 11 cases is 650 Liberty Avenue, Union, New Jersey 07083.

before the United States Bankruptcy Court for the District of New Jersey to represent interested party Alexander's Rego Shopping Center, Inc. ("Alexander's Rego") in the instant matter pursuant to rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the "Local Bankruptcy Rules"). In support of the relief requested herein, Movant states as follows:

JURISDICTION

1. This Court has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of this Application is a core proceeding pursuant to 28 U.S.C. §157(b). Venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

RELIEF REQUESTED

2. By this Application, Movant requests entry of an Order admitting *pro hac vice*, Heath B. Kushnick ("Applicant"). The good standing of Applicant is set forth in Applicant's certification which is submitted herewith (the "Certification"). Applicant is a partner with Greenberg Traurig LLP, and maintains offices at One Vanderbilt Avenue, New York, NY 10017. As the Certification demonstrates, Applicant is a member in good standing of the Bar of the highest court in which he is admitted. It is anticipated that Applicant will be active in the representation of Alexander's Rego. in this case. Accordingly, Movant respectfully requests that the Court grant the *pro hac vice* admission of Heath B. Kushnick and that he be permitted to appear on Alexander's Rego's behalf in connection with this case. No previous application for the relief sought herein has been made to this or any other court in connection with this proceeding

WAIVER OF MEMORANDUM OF LAW

3. Pursuant to Local Bankruptcy Rule 9013-1, Movant respectfully requests that the

Court waive the requirement that it file a memorandum of law in support of this Application. Movant respectfully submits that no memorandum of law is necessary because no novel issues of law are presented herein.

Respectfully submitted,

Dated: June 26, 2023

GREENBERG TRAURIG LLP

/s/ Alan J. Brody

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